

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARK L. BUNCE,

Plaintiff,

vs.

VISUAL TECHNOLOGY  
INNOVATIONS, INC.

and

MATHU G. RAJAN,

Defendants.

Civil Action

Case No. 2:23-cv-01740

**PLAINTIFF'S NOTICE OF  
WITHDRAWAL OF MOTION  
FOR PARTIAL SUMMARY  
JUDGMENT**

Plaintiff Bunce hereby gives notice that he withdraws his Motion for Partial Summary Judgment, Doc. 35, without prejudice to filing a subsequent motion for summary judgment.

Plaintiff filed his motion for partial summary judgment on March 29, 2024 to comply with the existing deadline for dispositive motions. *See* Scheduling Order, Doc. 17. At a status conference held on April 10, 2024, the Court stated that an amended scheduling order will be entered, which will set a new deadline for filing dispositive motions. The Court and counsel agreed that due to the scheduling changes Plaintiff would withdraw his pending motion, Doc. 35, without prejudice to him subsequently moving for summary judgment within the new deadline.

Respectfully submitted,

By: /s/ Michael D. Homans

Michael D. Homans  
ID No. 76624  
HOMANSPECK, LLC  
230 Sugartown Road, Suite 218  
Wayne, PA 19087  
(215) 419-7463  
mhomans@homanspeck.com

*Attorneys for Plaintiff Mark L. Bunce*

Michael P. Kohler, *admitted pro hac vice*  
MILLER & MARTIN PLLC  
Regions Plaza Suite 2100  
1180 West Peachtree Street, NW  
Atlanta, Georgia 30309-3407  
(404) 962-6100  
Michael.Kohler@millermartin.com

Robert F. Parsley, *admitted pro hac vice*  
Tennessee Bar. No. 23819  
MILLER & MARTIN PLLC  
832 Georgia Ave., Suite 1200  
Chattanooga, TN 37402  
Office: (423) 756-6600  
Bob.Parsley@millermartin.com

*Attorneys for Plaintiff Mark L. Bunce*